UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: FEB 27 1998

SUBJECT: Dupont Necco Park Site

FROM: John S. Frisco, Manager 9S7
Superfund Remedial Program

TO: Bruce Means, Chairman
National Remedy Review Board

I am writing to update you on the status of the proposed remedy for the Dupont Necco Park site in New York.

As you are aware, the Remedy Review Board reviewed the proposed remedial action for the Dupont site in May 1996. At that time, the Board generally supported the alternative proposed by Region 2 as detailed in your August 1996 memorandum. The alternative relied primarily on physical means to contain source area and groundwater contamination (including DNAPLs). In particular, the alternative included upgrading of the cap over the site and construction of a vertical barrier (i.e., grout curtain) around the site perimeter penetrating the underlying water bearing zones.

Among other comments on the proposed plan for the site, Dupont expressed a concern that it had not been given the opportunity to provide written comments to the Board for consideration. In fact, the PRP policy had not been finalized at the time of the review and thus the region did not request the five pages of written comments from Dupont. However, the region did provide the Board with a two-page letter from Dupont outlining its position on EPA’s preferred remedy.

Nonetheless, in the spirit of the administrative reforms, the region did not move forward with remedy selection, but rather gave Dupont the opportunity to discuss its position with senior management. Subsequent discussions and negotiations involving Dupont, EPA, and New York State staff extended over a significant period of time, resulting in an agreement on the planned remedial approach. I did participate in the process, but my role was limited to that of a Board member.

The region has now released a revised proposed plan for public comment reflecting the above remedial approach. Briefly, the new preferred alternative relies on a combination of physical and hydraulic means to control the contaminant source. It includes upgrading of the surface cap as previously required, but differs with respect to the physical vertical barrier. Instead, Dupont would prefer to utilize hydraulic controls, i.e., groundwater pumping, to contain the high levels of groundwater contamination underlying the site.

The new preferred remedial alternative is nearly identical to the previous Alternative 10. It has a present worth cost of about $65.1 million compared to $53.8 million for Alternative 9. This higher relative cost of $11.3 million is one of the primary reasons EPA selected Alternative 9 over Alternative 10. Dupont's preference for Alternative 10 is based on its lower capital cost and thus reduced up-front expenditure ($7.8 vs $15.6 million). In contrast, the O&M costs associated with Alternative 10 are higher; however, the company would be able to spread out those costs over time.

On the technical side, groundwater pumping is typically not the preferred approach for containing DNAPL type materials. However, Dupont believes that hydraulic controls can be as effective as a physical barrier and has committed to take all reasonable steps, i.e., additional wells and pumping, to ensure the effectiveness of Alternative 10. A comprehensive monitoring program will be implemented as part of the remedy to confirm this to be the case. Consequently, we have agreed to revise the proposed remedy accordingly.

We believe that the above actions by the agency are consistent with the goals of the administrative reforms. They give the responsible party a more significant role in the remedy selection process while at the same time ensuring adequate protection of public health and the environment.

If you or other board members have any questions or would like to further discuss this matter, do not hesitate to let me know.